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Attorneys for Creditor BETA Risk Management Authority

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re)	Case No. 13-01179-M11
SAN DIEGO HOSPICE & PALLIATIVE)	
CARE CORPORATION,)	REQUEST FOR SPECIAL NOTICE
)	
Debtor.)	
_____)	

Pursuant to Bankruptcy Rules 2002 and 9010, creditor BETA Risk Management Authority ("BETARMA") requests that all matters that must be noticed to creditors and any other parties in interest whether sent by the Court, the Debtor, the Trustee or any other party in the case, be served upon the following:

Gerald N. Sims, Esq.
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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedule of assets and liabilities, whether formal or informal,

1 whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery,
2 telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any
3 way any rights or interest of any creditor or party-in-interest in this case, including BETARMA with
4 respect to (a) the debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may
5 claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that
6 the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment
7 or other conduct by BETARMA.

8 **PLEASE TAKE FURTHER NOTICE**, that BETARMA intends that neither this Request nor
9 any later appearance, pleading, claim or suit shall waive (1) the right of BETARMA to have final orders
10 in noncore matters entered only after de novo review by a District Judge; (2) the right of BETARMA to
11 trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to
12 this case; (3) the right of BETARMA to have the District Court withdraw the reference in any matter
13 subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses,
14 setoffs, or recoupments to which BETARMA is or may be entitled under agreements, in law, in equity,
15 or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments BETARMA
16 expressly hereby preserves and asserts in these cases.

17 **PLEASE TAKE FURTHER NOTICE**, that BETARMA DOES NOT grant authority to the
18 undersigned to be its agent for service of process with respect to any adversary proceeding in the case.
19 BETARMA expressly states that the undersigned has no authority to accept service of process of any
20 adversary proceeding in this case under, inter alia, Bankruptcy Rule 7004 and that any summons or
21 complaint must be served directly upon BETARMA.

22 Dated: May 8, 2013

PYLE SIMS DUNCAN & STEVENSON
A Professional Corporation

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25 By: /s/ Gerald N. Sims
Gerald N. Sims, Attorneys for Creditor
26 BETA Risk Management Authority
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1 UNITED STATES BANKRUPTCY COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3 In re SAN DIEGO HOSPICE & PALLIATIVE CARE CORPORATION
4 Bankruptcy Case No. 13-01779-M11

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6 **CERTIFICATE OF SERVICE**

7 I, the undersigned, declare: I am and was at the time of the service of the papers herein referred
8 over the age of 18 years and not a party to the action; my business address appears below. I am a
9 resident of or am employed in San Diego County.

10 On May 8, 2013, a true copy of the within

11 **REQUEST FOR SPECIAL NOTICE**

12 was served as follows:

13 X **BY THE COURT VIA NEF:** Pursuant to controlling General Order(s) and in accordance
14 with the Administrative Procedures and Guidelines for Electronic Filing, the foregoing document(s) will
15 be served by the Court via Notice of Electronic Filing ("NEF") and hyperlink to the document. On May
16 8, 2013, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and the persons
17 listed on the attachment here are on the Electronic Mail List to receive NEF transmission at the email
18 address listed.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed on
20 May 8, 2013, in San Diego, California.

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/s/ Bonnie Connolly

Bonnie Connolly
PYLE SIMS DUNCAN & STEVENSON
401 "B" Street Suite 1500
San Diego CA 92101

Mailing Information for Case 13-01179-MM11

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- Everett G. Barry ebarry@mulvaneybarry.com, gcurtis@mulvaneybarry.com; ktran@mulvaneybarry.com
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- Matthew Troy Matthew.Troy@usdoj.gov
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- Stacie Yee stacie.yee@squiresanders.com, Bradley.Cosman@squiresanders.com; derek.judd@squiresanders.com